REMARKS

This Application has been carefully reviewed in light of the Office Action mailed July 12, 2005. At the time of the Office Action, Claims 1-19 were pending in this Application, and Claims 1-19 were rejected. Applicant amends Claims 1 and 19 and respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. §103

Claims 1-19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. US 2002/0000215 filed by Jeff Powell ("*Powell*") in view of U.S. Patent 2,372,485 issued to A.M. Griffin ("*Griffin*") or U.S. Patent 2,586,528 issued to B.S. Gerson ("*Gerson*"). Applicant respectfully traverses and submits Claims 1-19 are patentable over *Powell* in view of *Griffin* or *Gerson*.

Applicant submits that *Powell* in view of *Griffin* or *Gerson* fails to teach or suggest all of the limitations of amended Claims 1-19.

For example, amended independent Claim 1 recites:

> An arrangement comprising:
> a plastic piece comprising a fixing hole open at both a first axial end and a second axial end, and
> a metallic insert designed as a cylindrical bushing to be completely inserted into the fixing hole of the plastic piece to limit the attachment forces applied to the plastic piece when it is screwed into place, wherein the plastic piece comprises a plastic projection on the hole wall of the fixing hole and the metallic insert comprises a recess on its outer wall such that the metallic insert may be inserted through the first axial end and toward the second axial end of the fixing hole such that when the metallic insert is completely inserted into the fixing hole, the recess in the metallic insert interacts with the plastic projection in order to hold the metallic insert in the fixing hole of the plastic piece;
> wherein both the plastic projection on the hole wall of the fixing hole and the recess in the metallic insert are formed prior to the metallic insert being inserted into the fixing hole.

Powell in view of *Griffin* or *Gerson* fails to teach or suggest at least the following limitations of amended Claim 1:

- "the metallic insert may be inserted through the first axial end and toward the second axial end of the fixing hole . . . [and]
- "wherein both the plastic projection on the hole wall of the fixing hole and the recess in the metallic insert are formed prior to the metallic insert being inserted into the fixing hole."

Powell fails to teach or suggest a "projection on the hole wall of the fixing hole." Rather, *Powell* discloses a "foot portion 34," which is essentially a recess or cut-out formed in plastic intake manifold 10. Thus, *Powell* fails to teach or suggest either of the limitations listed above.

In addition, neither *Griffin* nor *Gerson* teach or suggest an insert that may be inserted though a fixing hole, "wherein both the plastic projection on the hole wall of the fixing hole and the recess in the metallic insert are formed prior to the metallic insert being inserted into the fixing hole," as recited in amended Claim 1.

Griffin teaches forcing a bushing 3 into an aperture 2 such that an oversize portion 10 of the bushing 3 shears the metal wall around aperture 2. The sheared metal (indicated by reference numeral 11) fills a groove 7 formed in the bushing 3, and helps hold the bushing 3 within the aperture 2. Thus, as can be clearly seen in Fig. 1 of *Griffin*, aperture 2 includes no projection prior to bushing 3 being inserted into aperture 2. Thus, even assuming arguendo that the sheared metal 11 within groove 7 could be equated with the "plastic projection on the hole wall of the fixing hole" as recited in Claim 1, such sheared metal 11 does not project from the inner wall of aperture 2 prior to bushing 3 being inserted into aperture 2. Thus, *Griffin* fails to teach or suggest "wherein both the plastic projection on the hole wall of the fixing hole and the recess in the metallic insert are formed prior to the metallic insert being inserted into the fixing hole."

Gerson teaches a bushing 1 for reinforcing an opening in the walls of a die-casting. Rows of indentations 3 are formed in the bushing 1. Metal is then die cast around the bushing 1, during which process the die cast metal flows into the indentations 3, which forms projections 6 extending into the indentations 3. According to *Gerson*, "The walls of the

indentation form an obtuse angle with the surface of the bushing, in order to facilitate the flow of metal therein, and eliminate the tendency of shearing of the projections on the die-cast metal which enter the indentations." (Col. 2, lines 45-54). (*Gerson* alleges that such relatively shallow and obtuse-angled indentations 3 allow more of the die cast metal to flow into the indentations 3 during the casting process than prior grooves which were relatively deep and sharp-edged. (Col. 1, lines 26-33).)

Thus, even assuming arguendo that projections 6 extending into indentations 3 could be equated with the "plastic projection on the hole wall of the fixing hole" recited in Claim 1, such projections 6 clearly do not exist prior to the formation of the die-casting. Thus, *Gerson* fails to teach or suggest "wherein both the plastic projection on the hole wall of the fixing hole and the recess in the metallic insert are formed prior to the metallic insert being inserted into the fixing hole," as recited in amended Claim 1. In fact, since *Gerson* teaches forming a die-casting around a bushing 1, *Gerson* does not even teach or suggest that "the metallic insert may be inserted through the first axial end and toward the second axial end of the fixing hole," as recited in amended Claim 1.

For at least these reasons, *Powell* in view of *Griffin* or *Gerson* clearly fails to teach or suggest "the metallic insert may be inserted through the first axial end and toward the second axial end of the fixing hole" and "wherein both the plastic projection on the hole wall of the fixing hole and the recess in the metallic insert are formed prior to the metallic insert being inserted into the fixing hole."

Thus, Applicant respectfully requests reconsideration and allowance of amended independent Claim 1, as well as Claims 2-18 that depend from Claim 1. In addition, for analogous reasons, Applicant respectfully requests reconsideration and allowance of independent Claim 19.

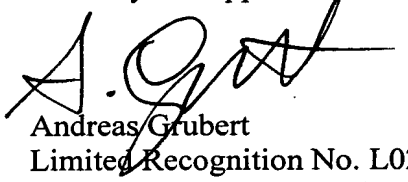
CONCLUSION

Applicant has now made an earnest effort to place this case in condition for allowance in light of the amendments and remarks set forth above. Applicant respectfully requests reconsideration of Claims 1-19, as amended.

Applicant believes there are no fees due at this time; however, the Commissioner is hereby authorized to charge any fees to Deposit Account No. 50-2148 of Baker Botts L.L.P. in order to effectuate this filing.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicant's attorney at 512.322.2545.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorney for Applicant



Andreas Grubert
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SEND CORRESPONDENCE TO:
BAKER BOTTS L.L.P.
CUSTOMER ACCOUNT NO. **31625**
512.322.2545
512.322.8383 (fax)